
**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MATTHEW DALY, on behalf of himself)
and all others similarly situated,)
Plaintiff,) **Case No. 1:21-cv-6805 (JRB/SMF)**
v.)
)
WEST MONROE PARTNERS, INC., et al.)
Defendants.)
)
)
)

**PLAINTIFF’S RENEWED MOTION FOR CLASS CERTIFICATION, APPOINTMENT
OF CLASS REPRESENTATIVE, AND APPOINTMENT OF CLASS COUNSEL**

Pursuant to the Court’s Minute Order on April 24, 2024, Plaintiff renews his motion for class certification, appointment of class representative, and appointment of class counsel (“Motion for Class Certification” or the “Motion”). Plaintiff incorporates by reference the memorandum, Docket No. 148, and associated declarations and exhibits already in the Court’s records. Docket Nos. 148-1–148-22.¹

Plaintiff filed his Motion for Class Certification on April 21, 2023. Docket No. 147. On November 2, 2023, after briefing was completed but before a decision was issued, this Court ordered a stay of further proceedings pending exhaustion of Plaintiff’s administrative claim and denied the Motion “without prejudice.” Docket No. 181. On April 24, 2024, the Court lifted the stay and allowed Plaintiff to “file any class certification motion by 5/1/24.” Docket No. 187.

Plaintiff thus hereby renews his Motion. Plaintiff further submits that no further briefing is

¹ Hard copies of the Motion, memorandum, and associated declarations and exhibits will be delivered to the Court.

necessary. The parties have thoroughly briefed the issues related to the Motion including a surreply from Defendants filed on July 7, 2023. *See* Docket Nos. 147 (Plaintiff's Motion), 154 (Defendants' Opposition to the Motion), 156 (Defendants' Joint Motion for Leave to File Unredacted Memo in Opposition to the Motion), 159 (Plaintiff's Reply), 166 (Defendants' Surreply in Opposition to Plaintiff's Motion). Accordingly, Plaintiff respectfully submits that no further briefing is necessary and asks the Court to grant the Motion for Class Certification as expeditiously as possible, so that the parties may consider settlement and prepare for trial.

Dated: May 1, 2024

/s/ Charles Field

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